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Match Group, Inc.

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

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11 EPIC GAMES, INC.,

12 Plaintiff and Counter-Defendant,

13 vs.

14 APPLE INC.,

15 Defendant and Counterclaimant.

Case No. 4:20-cv-05640-YGR
Case No. 4:11-cv-06714-YGR
Case No. 4:19-cv-03074-YGR

**DECLARATION OF DOUGLAS J. DIXON
PURSUANT TO CIVIL LOCAL RULE 7-
11(a) IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL DOCUMENTS AT
TRIAL PURSUANT TO CIVIL LOCAL
RULE 79-5(e)**

16 IN RE APPLE iPhone ANTITRUST
17 LITIGATION

18 DONALD R. CAMERON, et al.,

19 Plaintiffs,

20 vs.

21 APPLE INC.,

22 Defendant.

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DECLARATION OF DOUGLAS J. DIXON

I, Douglas J. Dixon, declare as follows:

3 1. I am a partner with the law firm of Hueston Hennigan LLP, counsel of record for
4 Match Group, Inc. (“Match”) in this action. I am an attorney duly licensed to practice before the
5 courts in the State of California. I submit this declaration in support of Match’s concurrently filed
6 Motion to Seal Documents pursuant to Civil Local Rule 79-5(e). I have personal knowledge of the
7 facts set forth in this Declaration except as stated otherwise, and if called as a witness, I could and
8 would testify competently to such facts under oath.

9 2. On April 24, 2021, counsel for Apple reached out to my co-counsel in this matter to
10 inform Match that Apple included on its exhibit list for trial two documents produced by Match and
11 designated as confidential. Apple requested that Match file the present motion to seal and indicated
12 that Apple would file objections, if any, on April 30, 2021. Match has worked diligently to identify
13 which of its confidential materials satisfy the “compelling reasons” standard for sealing and to
14 narrow its sealing request to the minimum amount necessary to protect Match’s confidential and
15 proprietary business information.

16 3. On April 23, 2021, counsel for Epic similarly informed Match that Epic had
17 included six documents produced by Match and designated as confidential on its exhibit list for
18 trial. Epic requested that Match file the present motion to seal and indicated that Epic would file
19 separate objections, if any. Match has worked diligently to identify which of its confidential
20 materials satisfy the “compelling reasons” standard for sealing and to narrow its sealing request to
21 the minimum amount necessary to protect Match’s confidential and proprietary
22 business information.

23 4. I declare under penalty of perjury of the laws of the United States of America that the
24 foregoing is true and correct. This declaration was executed this 29th day of April 2021, in
25 Marshall, Texas.

DOUGLAS J. DIXON